

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 06-20185-2

v.

HON. VICTORIA ROBERTS

MARCUS FREEMAN,

Defendant.

/

**United States' Response to the Defendant's Request for
Early Termination of Supervised Release**

On June 6, 2021, the defendant, Marcus Freeman, appearing *pro se*, filed a motion for early termination of his term of supervised release. The government does not oppose this request.

Pursuant to 18 U.S.C. § 3583(e)(1), after a defendant has served at least one year of supervised release, the court may terminate supervision. For this analysis, the court is directed to consider the sentencing factors of 18 U.S.C. § 3553(a). *See* 18 U.S.C. § 3583(e)(1). And “a district court must conclude that the early termination of supervised release is warranted both by the individual’s conduct and also by the interest of justice.” *United States v. Suber*, 75 F. App’x 442, 444 (6th Cir. 2003).

Freeman has been on supervised release since May 16, 2019 and is scheduled to complete his term on May 15, 2022. Undersigned counsel has communicated with his probation officer, who indicated that Freeman has been doing well, has no violations, has maintained full-time employment since his release, and has recently purchased a new home, and is agreeable to early termination. Given this report, the government does not object to Freeman's request to terminate his supervised release.

Respectfully submitted,

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Dated: June 21, 2021

Certificate of Service

I certify that on June 21, 2021, I electronically filed this response for the United States with the Clerk of the United States District Court for the Eastern District of Michigan using the ECF system, which will send notification of such filing to all attorneys of record. I will also provide, by U.S. Mail, a copy of this response to:

Marcus Freeman
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/s/ Dawn N. Ison
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